

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
JUN 19 4 58 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
UNITED PARCEL SERVICE WITNESS LUCIANI
(USPS/UPS-T5-35-36)

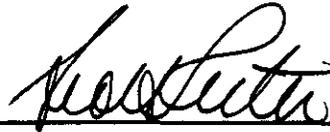
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to United Parcel Service witness Luciani: USPS/UPS-T5-35-36.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
June 19, 2000

USPS/UPS-T5-35. Please refer to page 1 of your Exhibit UPS-T-51.

- a. Confirm that your costs for City Carrier Driving Route in line 5 are volume variable costs. If you do not confirm, please explain fully.
- b. Confirm that your costs for City Carrier In-Office in line 6 are volume variable costs. If you do not confirm, please explain fully.
- c. Confirm that your costs for City Carrier Loading/Delivery in line 4 do not take into account economies of scale or economies of scope. If you do not confirm, please explain fully.

USPS/UPS-T5-36. Please refer to page 2 of your Exhibit UPS-T-51.

- a. What criteria did you use to determine the activities that are directly related to the time spent loading and delivering an additional parcel? Please be specific.
- b. What is your rationale for including activity 2121, "Make tally mark on ODR," in your calculation of the time spent loading and delivering an additional parcel?
- c. What is your rationale for including activity 2125, "Walk 1–20 paces," in your calculation of the time spent loading and delivering an additional parcel?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
June 19, 2000